

Jonathan C. McDonald  
McDonald Law Office, PLLC  
P.O. Box 1570  
Helena, MT 59624  
jm@mcdonaldlawmt.com  
ph. (406) 442-1493

Ilana H. Eisenstein, *pro hac vice* forthcoming  
DLA Piper LLC (US)  
1650 Market Street, Suite 5000  
Philadelphia, PA 19103  
ilana.eisenstein@us.dlapiper.com  
ph. (215) 656-3300

Peter Karanjia, *pro hac vice* forthcoming  
DLA Piper LLC (US)  
500 Eighth Street, NW  
Washington, DC 20004  
peter.karanjia@dlapiper.com  
ph. (202) 799-4000

Attorneys for *Amici Curiae* NetChoice, LLC and Chamber of Progress

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

SAMANTHA ALARIO, *et al.*,

*Plaintiffs,*

TIKTOK INC.,

*Consolidated Plaintiff,*

v.

AUSTIN KNUDSEN, *in his official  
capacity as Attorney General of the State  
of Montana,*

*Defendant.*

Lead Case No.  
CV 23-56-M-DWM

Member Case No.  
CV 23-61-M-DWM

**MOTION FOR *PRO HAC VICE*  
ADMISSION OF ILANA H.  
EISENSTEIN**

Pursuant to Local Rule 83.1(d) of the United States District Court for the District of Montana, Jonathan C. McDonald respectfully moves the Court for the admission *pro hac vice* of attorney Ilana H. Eisenstein, DLA Piper LLP, US, 1650 Market Street, Suite 5000, Philadelphia, PA 19103, for the purposes of this action.

The Declaration attached to this motion sets forth the merits of the motion pursuant to Local Rule 83.1(d)(4). Ms. Eisenstein is an active member in good standing of the courts set forth in her Declaration, is of good moral character, and has been retained to appear in this Court as attorneys for *Amici Curiae* NetChoice, LLC (“NetChoice”) and Chamber of Progress.

Furthermore, pursuant to Local Rule 83.1(d)(3), Ms. Eisenstein has obtained the written consent of the undersigned local counsel with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom documents will be served, and who will be responsible to participate as required under Local Rule 83.1(d)(7).

WHEREFORE, NetChoice and Chamber of Progress respectfully request that the Court grant the Motion for *Pro Hac Vice* Admission of Ilana H. Eisenstein and allow Ms. Eisenstein to participate as counsel for NetChoice and Chamber of Progress in this matter. A Proposed Order is attached.

Dated: August 2, 2023

Respectfully submitted,

By: /s/ Jonathan C. McDonald  
Jonathan C. McDonald  
McDonald Law Office, PLLC  
P.O. Box 1570  
Helena, MT 59624  
jm@mcdonaldlawmt.com  
ph. (406) 442-1493

*Attorneys for Amici Curiae, NetChoice LLC  
and Chamber of Progress*

**CONSENT**

Pursuant to Local Rule 83.1(d)(3), Jonathan C. McDonald, McDonald Law Office, PLLC, P.O. Box 1570, Helena, MT 59624, [jm@mcdonaldlawmt.com](mailto:jm@mcdonaldlawmt.com), ph. (406) 442-1493, certifies that he is a member in good standing of the State Bar of Montana, and hereby consents to being associated as attorney of record in the above-referenced case, and with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom papers shall be served, and who will be responsible to participate as required under Local Rule 83.1(d)(7).

Dated: August 2, 2023

By: /s/ Jonathan C. McDonald  
Jonathan C. McDonald  
McDonald Law Office, PLLC  
P.O. Box 1570  
Helena, MT 59624  
[jm@mcdonaldlawmt.com](mailto:jm@mcdonaldlawmt.com)  
ph. (406) 442-1493

*Attorneys for Amici Curiae, NetChoice LLC  
and Chamber of Progress*

**CERTIFICATE OF SERVICE**

I certify that on this date, an accurate copy of the foregoing document was served electronically through the Court's CM/ECF system on registered counsel.

Dated: August 2, 2023

By: /s/ Jonathan C. McDonald  
Jonathan C. McDonald